

The Honorable S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

V.

1. MARQUIS JACKSON,
 2. MARKELL JACKSON,
 3. MANDEL JACKSON,
 4. EDGAR VALDEZ,
 5. KEONDRE JACKSON,
 6. MICHAEL YOUNG,
 7. SIR TERRIQUE MILAM,
 8. TYRELL LEWIS,
 9. ROBERT JOHNSON,
 10. MATELITA JACKSON,
 11. MIRACLE PATU-JACKSON,
 12. DIYANA ABRAHA,
 13. ADEAN BATINGA, and
 14. TIANNA KARASTAN,

Defendants.

NO. CR24-164

UNITED STATES' MEMORANDUM
IN SUPPORT OF DETENTION
MOTIONS

I. INTRODUCTION

The United States respectfully submits this memorandum in support of its detention motions in this matter. This memorandum will provide a brief overview of the

1 investigation that led to these charges, summarize the applicable law relating to detention,
 2 and address specific facts presently known to the government relevant to the individual
 3 defendants' continued detention.

4 II. BACKGROUND OF THE INVESTIGATION

5 This case arose out of two separate investigations into the Jackson family drug
 6 trafficking organization (Jackson DTO) that eventually merged into one joint
 7 investigation led by the Federal Bureau of Investigation (FBI), the Drug Enforcement
 8 Administration (DEA), and other federal and local law enforcement agencies. Through
 9 source reporting, the initial FBI investigation identified Marquis Jackson as a major
 10 regional supplier of fentanyl into the Western District of Washington and elsewhere.
 11 Simultaneously, separate source reporting for the DEA identified Markell Jackson
 12 (Marquis Jackson's half-brother) as a major supplier of fentanyl pills into Lummi tribal
 13 lands and the surrounding Bellingham area.

14 Investigators identified Marquis Jackson as a member of the 44 Holly street gang
 15 in the Seattle, Washington area, which is a local subset of the Crips gang. Confidential
 16 sources also identified Markell Jackson as a member of the Holly Street Gang. Agents
 17 suspect that several other members of the DTO are connected to the 44 Holly street gang.

18 This investigation ultimately led to the use of court authorized Title III wire
 19 interceptions. In total, agents received authorization to intercept five separate telephones,
 20 with interceptions occurring between June and September 2024 as shown in the chart
 21 below:

Target Telephone	User	Date of Order	Date Ended
TT9 – (206) 468-4885	Markell Jackson	June 10, 2024	July 9, 2024
TT16 – (206) 939-8627	Adean Batinga	June 10, 2024	July 9, 2024
TT18 – (206) 883-0376	Mandel Jackson	August 5, 2024	September 3, 2024
TT19 – (206) 475-2800	Terrique Milam	August 5, 2024	September 3, 2024
TT23 – (602) 715-6825	Edgar Valdez	August 5, 2024	September 3, 2024

22 //

1 Wiretap interceptions, search warrants, and other investigative techniques revealed
 2 a massive conspiracy to distribute large amounts of narcotics, primarily fentanyl,
 3 throughout the country, including the Western District of Washington. Prior to the
 4 execution of search warrants and the arrests of defendants on the present indictment,
 5 investigators seized an estimated 825,900 fentanyl pills, 6.5 kilograms of fentanyl
 6 powder, 7.69 kilograms of cocaine, 3.3 kilograms of methamphetamine, 8 firearms, and
 7 \$93,205 in United States Currency.

8 On September 25, 2024, the Grand Jury returned an indictment charging 13
 9 members of the Jackson DTO with *Conspiracy to Distribute Controlled Substances*
 10 (Count1), 4 members with *Conspiracy to Commit Money Laundering* (Count 2), and 3
 11 members with *Distribution of a Controlled Substance* (Counts 3-5).

12 Law enforcement conducted coordinated arrests and searches on October 2, 2024,
 13 across multiple states. During these coordinated searches, law enforcement seized
 14 additional evidence from numerous locations in Washington, Arizona, Kansas, Missouri,
 15 Texas, and Georgia. Collectively, law enforcement seized multiple additional firearms
 16 and large quantities of controlled substances.¹

17 **III. LEGAL STANDARDS FOR DETENTION**

18 The Bail Reform Act provides that a court should detain a defendant pending trial
 19 if “no condition or combination of conditions . . . will reasonably assure the appearance
 20 of the person as required and the safety of any other person and the community.” 18
 21 U.S.C. § 3142(f).

22 The Bail Reform Act identifies four factors that a court should consider in
 23 analyzing detention issues: “(1) The nature and circumstances of the offense charged,
 24 including whether the offense . . . involves a narcotic drug [or] firearm...; (2) the weight
 25 of the evidence against the person ; (3) the history and characteristics of the person,

27¹ The evidence collected is still being documented at this time. These totals are estimates.

1 including . . . family ties, employment, financial resources, length of residence in the
 2 community, community ties, past conduct, history relating to drug or alcohol abuse,
 3 criminal history, and record concerning appearance at court proceedings ; and . . . (4) the
 4 nature and seriousness of the danger to any person or the community that would be posed
 5 by the person's release" 18 U.S.C. § 3142(g). Of these factors, the weight of
 6 evidence is least important, and the statute neither requires nor permits pretrial
 7 determination of guilt. 18 U.S.C. § 3142(g).

8 The United States typically bears the burden of showing that a defendant poses a
 9 danger to the community by clear and convincing evidence, and it bears the burden of
 10 showing that a defendant poses a flight risk by a preponderance of the evidence. *United*
 11 *States v. Gebro*, 948 F.2d 1118, 1120 (9th Cir. 1991). However, where, as here
 12 defendants are charged with one or more serious Title 21 offenses, the Bail Reform Act
 13 expressly provides that:

14 [s]ubject to rebuttal by the person, it shall be presumed that no condition or
 15 combination of conditions will reasonably assure the appearance of the
 16 person as required and the safety of the community if the judicial officer
 17 finds that there is probable cause to believe that the person committed an
 offense for which a maximum term of imprisonment of ten years or more is
 prescribed in the Controlled Substances Act (21 U.S.C. 801 *et seq.*) . . . or
 an offense under section 924(c) . . . of title 18 of the United States Code . . .

18 U.S.C. § 3142(e). The return of an indictment is sufficient to support a finding of
 19 probable cause, triggering the rebuttable presumption. *United States v. Hazime*, 762 F.2d
 20 34, 37 (6th Cir. 1985); *United States v. Suppa*, 799 F.2d 115, 119 (3d Cir. 1986); *United*
 21 *States v. Stricklin*, 932 F.2d 1353, 1354 (10th Cir. 1991).

22 In a case where the presumption applies, Courts have found that the *defendant*
 23 bears the burden of producing evidence that he does not pose a danger to the community
 24 or risk of flight in order to rebut the presumption. See *United States v. Abad*, 350 F.3d
 25 793, 797 (8th Cir. 2003); *United States v. Mercedes*, 254 F.3d 433, 436 (2d Cir. 2001);
 26 //

1 *Stricklin*, 932 F.2d at 1354. The government retains the burden of persuasion. *Mercedes*,
 2 254 F.3d at 436.

3 However, even if a defendant has met his burden of production relating to these
 4 two factors, the presumption favoring detention does not disappear. Rather, it remains a
 5 factor to be considered among those weighed by the district court. *See Stricklin*, 932 F.2d
 6 at 1354-55; *Mercedes*, 254 F.3d at 436; *United States v. Rueben*, 974 F.2d 580, 586 (5th
 7 Cir. 1992). If the presumption were to vanish once a defendant produced *some* evidence,
 8 courts would not give adequate deference to the fact that Congress has determined “that
 9 drug offenders pose a special risk of flight and dangerousness to society.” *United States*
 10 *v. Martir*, 782 F.2d 1141, 1144 (2d Cir. 1986); *United States v. Hare*, 873 F.2d 796, 798
 11 99 (5th Cir. 1989).

12 Finally, it is well-settled that at a detention hearing the government may present
 13 evidence by way of an evidentiary proffer sufficient to make the court aware of the
 14 defendant’s role in the offense, the weight of the evidence against the defendant, and
 15 other relevant factors. *See, e.g. United States v. Salerno*, 481 U.S. 739, 743 (1987);
 16 *United States v. Winsor*, 785 F.2d 757 (9th Cir. 1986); *United States v. Cardenas*, 784
 17 F.2d 937 (9th Cir.), *vacated as moot upon defendant’s conviction*, 792 F.2d 906 (9th Cir.
 18 1986). The statements of fact herein, which are based on the sworn wiretap and search
 19 warrant affidavits, summaries of the results of said searches and wiretap interceptions,
 20 and information obtained at the time of the defendants’ arrests, is presented as such a
 21 proffer.

22 **IV. INDIVIDUAL DEFENDANTS’ ROLES AND CONDUCT**

23 The following is a summary of some of the facts related to certain individual
 24 defendants related to their roles in and conduct during the conspiracy that is related to the
 25 danger they present to the community and their risk of flight.²

27 ² This summary does not include all of the evidence in support of the charges in the indictment, but rather is
 intended to illustrate some of the conduct that the defendants engaged that supports a determination that they present

Memorandum in Support of Detention - 5

United States v. Marquis Jackson, et al. / CR24-164-JNW

UNITED STATES ATTORNEY

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1 **A. MARQUIS JACKSON³:**

2 According to source reporting, which was later corroborated by intercepted
 3 communications, Marquis Jackson is the leader of the Jackson DTO. Intercepts indicate
 4 that he was the main connection to the source of supply, Edgar Valdez, and that he
 5 directed other members of the conspiracy, such as Miracle Jackson and Tyrell Lewis, to
 6 pick up large shipments of narcotics on his behalf.

7 In October 2022, Phoenix Police officers arrested Marquis Jackson for possession
 8 of a stolen vehicle. According to law enforcement reports, when law enforcement officers
 9 initially activated their emergency lights, Marquis Jackson took off at a high rate of speed
 10 forcing law enforcement to disengage pursuit. They then used aerial surveillance to track
 11 his vehicle and executed a stop at another location. Inside Marquis' vehicle, law
 12 enforcement located three iPhones, \$10,100 in cash, a gold and diamond Rolex watch, a
 13 gold and diamond necklace, and a stolen firearm. Marquis claimed the firearm was not
 14 his, but the only other person in the vehicle was a woman who claimed that she had just
 15 met Marquis in the club and that she had no idea the car was stolen nor that there was a
 16 firearm in the car. Financial records indicated that Marquis had no source of legitimate
 17 income. Thus, the use of multiple phones and possession of large amounts of cash and
 18 luxury items was consistent with narcotics trafficking.

19 According to Marquis' criminal history report, he was prohibited from possessing
 20 that firearm as he has multiple prior felony convictions including: 2013 King County
 21 Superior Court convictions for (1) Attempted Robbery in the First Degree, and (2)
 22 Attempted Unlawful Possession of a Firearm in the First; 2014 King County Superior
 23 Court conviction for Unlawful Possession of a Firearm in the First Degree; 2014 King
 24

25 a danger to the community and a risk of flight. Information in this section is based on facts obtained from search
 26 warrant and wiretap applications in this investigation, seizures, observations, and other evidence gathered by law
 27 enforcement as part of the investigation. References to criminal history are based on a review of NCIC criminal
 history reports.

³ Members of the Jackson family will be referred to by their first name to avoid confusion.

Memorandum in Support of Detention - 6

United States v. Marquis Jackson, et al. / CR24-164-JNW

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1 County Superior Court conviction for (1) Drive by Shooting, and (2) Unlawful
 2 Possession of a Firearm in the First Degree (sentenced to 46 months on these three
 3 cases); and 2017 Pierce County Superior Court Conviction for Unlawful Possession of a
 4 Firearm in the First Degree (sentenced to 54 months).

5 In August 2024, Agents intercepted Marquis Jackson setting up a large fentanyl
 6 deal with the DTO source of supply, Edgar Valdez. On August 9, 2024, Marquis texted
 7 Valdez stating that he needed “200” referring to 200,000 fentanyl pills. He then asked
 8 Valdez to show him a photograph of the fentanyl pills. Valdez responded with a picture
 9 of his hand holding fentanyl pills. Marquis then texted Valdez “Meet here” followed by a
 10 link to the Marriot at the Phoenix hotel.

11 Shortly after, agents observed Marquis’ sister, Miracle Jackson, and Tyrell Lewis
 12 arrived in a black Porsche with a small child. Later that evening, Valdez texted Marquis
 13 “I’m on my way,” and Marquis responded, “Black Porsche.” Agents then observed a
 14 black Porsche drive around to the back of the hotel and meet with a vehicle suspected of
 15 belonging to Valdez. Immediately after, Valdez texted Marquis: “I gave him the sample
 16 painting.”

17 Later that evening, Marquis and Valdez exchanged the following text messages
 18 indicating a future deal of up to 300,000 fentanyl pills. Agent interpretations of the
 19 messages are included in parenthesis:

20 **Marquis:** you didn’t give my sister any work [narcotics]? (Session 224)

21 **Marquis:** That’s all [the money/valuables] I had papi (Session 225)

22 **Valdez:** Papi, why didn’t you send me the Cartier [watch]? (Session 235)

23 **Valdez:** I need to check those watches (Session 236)

24 **Marquis:** You can check at capri jewelers were [sic] I bought them (Session 237)

25 [***]

26 **Marquis:** I really need work my people need 300 [300,000 pills] out here they
 27 have cash ready but won’t give it to me without product. (Session 244)

1 **Marquis:** I'll give you what I got I have no more money rn [right now] I gave all I
 2 had (Session 246)

3 **Marquis:** Am [sic] I have my Porsche (Session 248)

4 **Marquis:** Whatever it takes (Session 249)

5 [***]

6 **Marquis:** Let me know after you check the watches papi (Session 251)

7 **Valdez:** Did you review the sample I left you? (Session 255)

8 **Marquis:** Yes they are good are they all like that? (Session 256)

9 Immediately after this call, agents intercepted a call between Marquis and Mandel.

10 During the call, Marquis said: “your dumbass daughter [Miracle] just got me hit again”
 11 because she gave the “plug” “all my money and two of my watches” and only got a
 12 “fucking boat” (referring to 1,000 fentanyl pills). Later in the call, Mandel talked to a
 13 woman in the background (later identified as Matelita), “She done gave the plug all the
 14 money and two watches and got out with one boat. I know babe.” Mandel asked him why
 15 he didn’t have Tyrell do the deal. Marquis responded, “Tyrell was there with her. His
 16 dumbass let her get in the car.” Matelita can be heard in the background saying, “She
 17 don’t know what the fuck. She don’t do that type of shit.” Mandel asked, “How much
 18 cheese she give him?” Marquis replied, “50.”

19 The following day, Marquis set up a deal with Valdez to bring the remainder of
 20 the pills from the prior deal. Valdez agreed. Marquis then called Mandel and told him to
 21 talk to Miracle and instruct her to go meet with the plug. Minutes later, agents intercepted
 22 a call between Mandel and Miracle during which Mandel told Miracle to “take care of
 23 business.” (Session 404) A male with Miracle, presumed to be Tyrell Lewis, got on the
 24 phone and told Mandel that Miracle “doesn’t want to handle this.” The male told Mandel
 25 that he hadn’t met with “the plug” before, but he knew the game and that they usually
 26 want to keep the “plug” away from their families.

27 Later that evening, law enforcement observed Valdez leave his stash house and

1 drive to the Marriott. As soon as he arrived, he texted Marquis: "I'm here." Marquis
 2 called Valdez a couple minutes later telling him that his sister (Miracle) was coming
 3 down. Around this time, investigators inside the hotel observed Miracle and Tyrell exit
 4 the hotel, enter the Black Porsche, and drive to the back of the hotel parking lot near
 5 Valdez' sedan. Shortly after, agents observed the Porsche return to the hotel parking lot
 6 and Tyrell and Miracle take a black roller suitcase they didn't have before up to their
 7 hotel room. Agents believe Miracle and Tyrell then counted the pills in the room because



20 15 minutes later, Marquis texted Valdez: "That's only 100 papi" followed by a second
 21 text: "I need 2." Ten minutes later, Tyrell and Miracle left the hotel with the roller
 22 suitcase. Shortly after, law enforcement stopped their vehicle and obtained a warrant to
 23 search their vehicle. Inside the vehicle, law enforcement found the roller suitcase which
 24 contained 100,000 fentanyl pills.

25 An hour later, law enforcement intercepted a call between Marquis Jackson and
 26 Mandel Jackson where they discussed whether this was a set up. Marquis told Mandel
 27 that they faceted him while they were in the room counting the drugs and there was

1 only 100 instead of 200 (referring to 100,000 pills instead of 200,000). (Session 425)
 2 Agents sent the fentanyl pills to the DEA laboratory, which indicated that the fentanyl
 3 pills tested positive for p-Fluorofentanyl (a fentanyl analogue) with a combined weight of
 4 10.9 kilograms.

5 The investigation suggests that Marquis was armed with firearms. As discussed
 6 above, in 2022, Agents stopped Marquis in a stolen vehicle with a stolen firearm.
 7 Additionally, on August 20, 2024, Agents intercepted a call between Marquis and
 8 Mandel Jackson where they discussed attempting to get Marquis an unregistered firearm
 9 during his trip to Chicago. Mandel said that he talked to his cousin, but “all his (firearms)
 10 are in his name. He has to call his little cousin, they in the streets, he gonna grab one from
 11 him. His are all registered.” (Session 1286). Later in the call, Mandel confirmed that he
 12 was going to make calls on Marquis’ behalf to get him “a little gleazy (a glock) or
 13 something.” Mandel’s wife Matelita is in the background talking to them during this
 14 portion of the call.

15 On October 2, 2024, law enforcement arrested Marquis in a residence in Atlanta,
 16 Georgia. Inside the residence, law enforcement also located Harold Butler (a known DTO
 17 redistributor) along with eight other individuals. When they searched the residence, law
 18 enforcement found four or five firearms.

19 **B. MARKELL JACKSON & DIYANNA ABRAHA:**

20 Markell Jackson led the Bellingham distribution network of the Jackson DTO.
 21 Abraha is Markell’s girlfriend and assisted him by making travel arrangements, coming
 22 with him on drug deals, and laundering drug proceeds on his behalf. Law enforcement
 23 conducted numerous controlled buys into Markell using an undercover agent (UC). On
 24 October 31, 2023, the UC bought 5,000 fentanyl pills for \$4,000. Pursuant to the DEA
 25 laboratory, those pills weighed 540.8 grams and tested positive for p-Fluorofentanyl. The
 26 deal took place in the UC’s vehicle, but Abraha was present in Markell’s vehicle during
 27 the deal. On December 7, 2023, the UC bought 5,000 pills for \$4,000 from Markell.

1 During the deal, Markell also indicated that he could get powdered fentanyl. Again,
 2 Abraha was in Markell's vehicle while the deal took place in the UC's vehicle.

3 Immediately following this controlled buy, agents followed Markell and Abraha to
 4 another location where they observed Robert Bellair enter their vehicle for a short period
 5 of time and exit with a small container. Agents followed Bellaire's vehicle and pulled
 6 him over. Inside Bellaire's vehicle, law enforcement recovered 6,500 fentanyl pills. On
 7 September 30, 2024, Magistrate Judge S. Kate Vaughan signed an arrest warrant and a
 8 complaint charging Robert Bellair with Possession with Intent to Distribution Fentanyl.

9 Most of these controlled buys took place near the Lummi tribal reservation.
 10 Agents also identified Markell as the main supplier to four known drug dealers on the
 11 Lummi tribal reservation. During the time that Markell distributed fentanyl into the
 12 Lummi tribal reservation, the Lummi tribe saw a dramatic increase in fentanyl related
 13 overdoses. In September 2023, four tribal citizens died of fentanyl overdoses within a
 14 four-day period. On one of the decedent's phones, law enforcement observed text
 15 messages in the month prior to the overdose where the decedent obtained Markell's
 16 number. The phone also showed communications between the decedent and Bellair only
 17 four days before the overdose where the decedent again attempted to get in touch with
 18 Markell. Since the overdose, law enforcement has repeatedly observed Bellair driving
 19 around in that decedent's vehicle.

20 Markell sold fentanyl pills to the UC on multiple other occasions. On March 7,
 21 2024, Markell sent Adean Batinga and Robert Johnson as couriers to sell the UC 5,000
 22 fentanyl pills for \$5,000; on March 18, 2024, Markell sold the UC 5,000 pills for
 23 \$5,000; and on June 12, 2024, Markell sold the UC 10,000 pills for \$8,500 (agents later
 24 learned that this deal included 1,000 fentanyl pills and 9,000 sham pills).

25 For many of these deals, Abraha set up travel accommodations for Markell. For
 26 example, on April 25, 2024, Markell attempted to cross into Canada with \$10,555 in cash
 27 before being turned back by Canadian border patrol. Financial records and iCloud

1 messages between Markell and Abraha show her booking him a hotel in Vancouver that
 2 night. Financial records also show Abraha booking multiple hotels in the Bellingham area
 3 for Markell.

4 Abraha also helped launder Markell's money. On February 20, 2024, Abraha
 5 made four ATM cash deposits totaling \$50,050 which she withdrew that same day.
 6 Additionally, she made at least six large scale cash exchanges at various banks for
 7 amounts just under the \$10,000 reporting requirement. Agents believe these were
 8 attempts at structuring the cash amounts to avoid bank reporting requirements. In
 9 addition to accompanying Markell on several drug deals, they also openly discussed drug
 10 trafficking. For example, on June 23, 2024, Markell told Abraha that he was on his "last
 11 juug" which is common street vernacular for a drug deal.

12 According to TIII intercepts, Markell Jackson was armed with firearms. On June
 13 14, 2024, investigators intercepted a call between Markell and an unidentified male.
 14 During the call, Markell agreed to provide the unidentified male .40 caliber bullets for his
 15 "gen5" (a Glock pistol) in exchange for a gun. On August 19, 2024, Markell called
 16 Mandel to ask if his Glock was at the residence. And on August 29, 2024, Mandel called
 17 Markell to see if he had a pistol that he could provide someone. Markell told Mandel,
 18 "we only got chops" (a reference to rifle style firearms) and then asked Mandel, "where
 19 my Glock at?" Agents obtained a search warrant for Markell's iCloud account, which
 20 included an image attachment of what appeared to be a short, barreled rifle, and a text
 21 message from Robert Johnson that stated: "Same n**** trynna trade you 23 wit beam (a
 22 Glock 23 pistol) & 22 stick (an extended magazine) for your 19 (a Glock pistol) ... it's
 23 gen 3 tho." These intercepts indicate that Markell was often armed with a firearm.

24 On October 2, 2024, law enforcement executed a search warrant on Abraha's
 25 residence, but she was not present. Law enforcement discovered that she was staying at a
 26 local hotel within the radius of her GPS phone pings. Phone tolls showed multiple
 27 incoming calls to her phone just after agents executed simultaneous nationwide warrants

1 at 4:00 AM Pacific Standard Time. Shortly after, Abraha's phone pings indicated that she
 2 left the hotel and drove towards the residence of Mandel and Matelita Jackson. Around
 3 the time her phone pings arrived at Mandel and Matelita's residence, the search team saw
 4 an Acura drive by, roll down the window, and Markel Jackson leaned out and yelled:
 5 "Did you find what you were looking for?" Immediately after, Abraha turned off her
 6 phone to eliminate any GPS pings, so agents were unable to locate her. Based on this
 7 information, agents believe that Abraha knows she is currently wanted by law
 8 enforcement and is actively attempting to evade detection.

9 **C. MANDELL JACKSON & MICHAEL YOUNG:**

10 Agents identified as a long-time gang member of both Deuce 8 and State Street
 11 Crips. Mandel served as the consigliore/advisor for the Jackson DTO, he stored firearms
 12 and drugs at his residence, and he also planned his own large scale drug deals. Michael
 13 Young appears to be the leader of another DTO that partners with the Jackson DTO and
 14 specifically conspired with Mandel to set up large purchases of controlled substances.

15 Intercepts reveal that Mandell set up large scale drug deals on behalf of the DTO
 16 and that he was in constant communication with his sons (Marquis and Markell)
 17 regarding the Jackson DTO drug trafficking. As described above, Mandell served as a go-
 18 between for Marquis and Miracle during the 100,000 fentanyl pill seizure that took place
 19 on August 10, 2024 and was the one to order Miracle to "take care of business" when she
 20 didn't want to follow through with the drug deal.

21 Additionally, in a series of intercepted calls between Mandel and Michael Young,
 22 they compared prices of their respective drug suppliers and discussed going in together
 23 on a large-scale purchase of narcotics. On August 6, 2024, Young asked Mandel if he
 24 would talk to his "weeples" (slang for "your people," which referred to Marquis and
 25 Markell) and clarified that he was not talking about the "freeway ricky ross (cocaine)
 26 either." Mandel clarified, "the fendys" (a reference to fentanyl pills). Young replied,
 27 "yeah." Mandel told Young that he was getting fentanyl for 25 cents per pills, and Young

1 replied that his people were paying between 32 and 34 cents per pill. Mandel promised to
 2 let Young know if he was able to put “something together” (a reference to setting up a
 3 drug deal). Young replied, “yeah, let me know.”

4 On August 9, 2024, Mandel asked Young how much his people were charging for
 5 “smurfs” (a common term for blue fentanyl laced m30 pills). Young said, “33 for 100.”
 6 Young then bragged about how he was going “to go ‘wang’ them over the head with this
 7 bread,” which was a reference to a large-scale drug deal that he currently had set up.
 8 Mandel then suggested that he and Young go in together to “make one big play.” Young
 9 agreed and Mandel promised to call him back.

10 On August 26, 2024, Mandel asked Young if he had found those “cool smurfs”
 11 and told him that his boys (referring to Marquis and Markell) were messing with
 12 “fendybelts.” The two of them then compared pricing. Unbeknownst to Mandel, shortly
 13 after this call, agents arrested his source of supply, Edgar Valdez, thereby cutting off the
 14 Jackson DTO’s supply of fentanyl pills. But Mandel and the Jackson DTO quickly found
 15 a new supplier. On September 2, 2024, Mandell called Young to tell him they “just found
 16 a new line (supplier), so, running it back up.” These intercepts show that Mandel and
 17 Young both served as high-ranking members in their respective DTOs and that they
 18 conspired together on pricing and planned on going in together on a large purchase of
 19 narcotics.

20 //

21 //

1 On May 25, 2023, a Fed ex Shipping Hub in Phoenix conducted an administrative
 2 search that revealed a package sent by “Michael G. Young Jr.” with Young’s number
 3 listed as a contact number contained 70,000 fentanyl pills. The pills were packaged in
 4 two large protein powder containers. The use of protein powder containers to disguise
 5 fentanyl pills during transport were a common tactic of Jackson DTO members, thereby
 6 further cementing Michael Young’s connection to the Jackson DTO.



16 In addition to conspiring with Michael Young, Mandel made other deals on behalf
 17 of the DTO. For example, On August 20, 2024, Agents intercepted a conversation
 18 between Mandel and Chad Conti where Conti noted that several of his customers had
 19 complained about a recent batch of pills. Mandel apologized and explained, “we be
 20 grabbing a gang of them at a time [buying pills in bulk], not just a .. you know what I’m
 21 saying... like 100 [100,000 pills].” Conti agreed with Mandel that it is hard to check
 22 quality when you are buying in bulk. Conti told Mandel that he wanted to continue
 23 buying from him because he had been buying from him for three years without any prior
 24 issues. This call shows that Mandel is part of large-scale drug purchases and that he has
 25 regularly been distributing controlled substances on behalf of the DTO for at least three
 26 years.
 27

1 Additionally, Mandel appears to have stored controlled substances and guns for
 2 the DTO at his residence. For example, on August 8, 2024, agents intercepted a call
 3 between Mandel and Markell where they discussed a disputed count of narcotics and
 4 Mandel said, “there was 6 extra in the pack when I counted them.” Later in the call,
 5 Mandel described that he had been nervous about keeping stuff at the house because he
 6 had seen some suspicious vehicle and he told Markell “everything that was in there, I just
 7 gave it to dude. I passed that sh** off. Get it on up out of here.”

8 Intercepts also indicate that Mandel both stored firearms for DTO members and
 9 was armed with a firearm himself. As described previously, two intercepts indicated that
 10 Markell left his “Glock” at Mandel’s residence. Additionally, on August 29, 2024,
 11 Mandell called Markell and told him that a female called and told him, “I need a pistol,
 12 somebody just killed my brother last night.” Mandel told Markell that he “only got one [a
 13 gun], the one I carry right now” and that he did not have an extra gun for her.

14 Intercepts indicate that Mandell and Marquis know of the deadly effects of
 15 fentanyl. On August 27, 2024, agents intercepted a call between Mandel and Marquis
 16 where they mourn the overdose death of a close friend. But later in the call, Mandel asked
 17 Marquis if he found another supplier and Marquis replied, “yeah we back on.” So even
 18 when confronted with the deadly effects of fentanyl, they continued to sell it.

19 Michael Young has a lengthy criminal history including the following: 2006 King
 20 County Superior Court (cause number 06-1-07224-0) convictions for (1) Possession with
 21 Intent to Distribute Controlled substances, and (2) Unlawful Possession of a firearm;
 22 2008 King County Superior Court (cause number 08-1-02767-4) conviction for
 23 Possession with Intent to Distribute Controlled Substances; 2011 King County Superior
 24 Court (cause number 08-1-11944-7) conviction for Escape in the Second Degree; and
 25 2015 King Count District Court conviction for Assault in the Fourth Degree – Domestic
 26 Violence.

27 On October 2, 2024, law enforcement executed a warrant at Mandel’s residence.

1 Inside, law enforcement found a backpack containing a firearm and a large quantity of
2 weed. Based on prior intercepts from Mandel describing carrying a firearm and selling
3 marijuana, law enforcement believes this firearm is likely connected to Mandel.

4 Additionally, law enforcement found an estimated 2,000 fentanyl pills in the garage.

5 That same day, law enforcement executed a warrant on a residence where Michael
6 Young was staying. Inside, law enforcement found several firearms, but they could not
7 connect them directly to Young and they may have been owned and possessed lawfully
8 by the homeowner. Additionally, law enforcement found 186 grams of unidentified
9 narcotics.

10 **D. EDGAR VALDEZ**

11 Edgar Valdez was the supplier of fentanyl pills for the entire Jackson DTO.
12 According to intercepted communications, he regularly supplied the DTO with hundreds
13 of thousands of fentanyl pills including the 100,000-fentanyl pill deal described above
14 and at least one 200,000 pill sale to Keondre Jackson described in more detail later in this
15 memorandum.

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1 On August 18, 2024, Agent served a federal warrant to search Valdez' residence
2 and stash house. At his residence, Agents located nearly 2,000 fentanyl pills, two Rolex
3 watches, a gold chain, and \$25,000 in United States Currency. At the stash house, law
4 enforcement located a black Ruger firearm, a money counter, 1,774 grams of powdered
5 fentanyl, 2.5 kilograms of methamphetamine, and 37 kilograms of fentanyl pills. A
6 hollowed-out tire found in the stash house seemed to indicate that the DTO transported
7 the drugs using tires filled with narcotics:



1 **E. KEONDRE JACKSON:**

2 Keondre Jackson served as a large-scale redistributor and drug purchaser for the
 3 Jackson DTO. Law enforcement first identified Keondre based on concerning June 19,
 4 2024 intercepted call to Markell where Keondre (then an unidentified male) said: “Here I
 5 come, brother, we done got into it, we done mashed a n**** on them.... Yeah, on God
 6 we just did a n**** bad.”

7 Concerned that this call referenced a potential shooting,⁴ law enforcement
 8 obtained a warrant for the iCloud account related for the phone number from the call,
 9 which identified Keondre as the owner of the account based on the account’s e-mail
 10 address (keondre.jackson24@gmail.com), numerous selfies, and photographs of airline
 11 tickets in his name. The account also established Keondre’s connection to the DTO based
 12 on numerous videos of Keondre engaged in luxury shopping with Marquis Jackson and
 13 saved rap lyrics where Keondre describes selling drugs with his cousin “bounce,” which
 14 is the known moniker for Marquis Jackson. One of the many selfie style photographs on
 15 Keondre’s phone showed him holding large amounts of cash next to a firearm with an
 16 extended magazine. Agents also located a note on Keondre’s phone with a description of
 17 a gun matching the gun in the photograph below.



27 ⁴ Law enforcement later discovered that this call referred to a bar fight rather than a shooting.

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1 The account also contained several text messages with the Jackson DTO supplier,
 2 Edgar Valdez, where Keondre set up large drug deals on behalf of the Jackson DTO. For
 3 example, on June 15, 2024, the following SMS text message exchange between Keondre
 4 and Valdez indicate that Keondre purchased 180,000 fentanyl pills for \$58,400:

5 **Keondre:** 58,400

6 **Valdez:** Daddy, it will be 200. Do you have the money for 200?

7 **Keondre:** Okay I'm here

8 **Valdez:** red jeep

9 **Keondre:** Thank you papi

10 **Keondre:** Missing 20k papi... Papi these are no good... Can you come back?

11 **Valdez:** because they are bad daddy

12 **Keondre:** I know papi but they are bad like the last time... I just want the
 13 money back papi this is bad work

14 **Valdez:** Daddy, it's just dust, take it off, I'll give you 2k more free for that dust.

15 **Keondre:** No papi they won't sell papi we took a loss last time with ones like these
 16 can't take a loss like that again “

17 **Valdez:** Ok, come back or do you want them already

18 **Keondre:** I want them papi if you do the 5 next time

19 **Valdez:** Daddy you gave me money for 176 and I gave you 180

20 These SMS messages indicate that Keondre bought drugs from Valdez several
 21 times. On June 20, 2024, Keondre texted Valdez “Come back with the 20 papi I want
 22 them. Valdez replied, “Next time are you going to pay me the 60.” On June 30, 2024,
 23 Valdez and Keondre texted about meeting up. On July 3, 2024, Keondre texted, “Got the
 24 50 we owe for you [sic] right now papi whenever you’re ready.”

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1 On July 4, 2024, Valdez sent Keondre the following picture of a large box of
2 fentanyl pills. Keondre then asked, “Can you bring another 200 papi and I give you
3 20k...and the rest when I get back...30k.”



17 **F. SIR TERRIQUE MILAM:**

18 Sir Terrique Milam served as a drug redistributor for Markell on behalf of the
19 Jackson DTO. Agents intercepted Milam’s line, which revealed numerous street level
20 drug deals outlining his role as a redistributor for Markell. These communications also
21 indicate that Milam was in Markell’s trusted circle and that he worked closely with
22 Markell. In August 2024, law enforcement intercepted communications between Markel
23 and Milam where they discussed using female couriers to send “ghost bags” filled with
24 narcotics over commercial airlines. Agents also intercepted numerous interceptions where
25 Markell told Milam when and where he was conducting drug deals.

26 Markell recruited Milam to partner with him on a major drug purchase. On June
27 24, 2024, investigators intercepted Markell texting with Valdez to set up a purchase of

1 150,000 fentanyl pills.⁵ Less than 30 minutes later, agents intercepted a call between
 2 Markell and Milam where Markell tells Milam about the deal and that he is getting on a
 3 flight that night. Markell asked Milam to meet him there the following morning to help
 4 with the deal and told him that they could buy pills for 33 cents each. Markell then said,
 5 “we’re just gonna re-up and keep flipping and then keep flipping, keep flipping.” Milam
 6 agreed to help Markell with the drug deal and the two then discussed how Milam could
 7 charge 40 to 50 cents per pill and make a lot of money off the deal.

8 Intercepted communications indicate that Milam also engaged in interstate
 9 prostitution. On August 10, 2024, Milam received a message from an unidentified female
 10 who told him about a man with “hella money” who asked what she could do, and she told
 11 him that “she could do full service.” On August 11, 2024, Milam exchanged a series of
 12 text communications with one of his prostitutes where he told her, “I don’t ‘treat you like
 13 a human’ because you don’t treat me like I’m daddy (a pimp) simple.” She replied,
 14 “you’re right” and “You good.” Milam then said, “Just keep it I don’t need a funk 200
 15 dollars here and there you’re a lostitute⁶ who’s halfway hoeing.”

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27 ⁵ Agents are unsure of whether this deal ever took place.

⁶ Lostitute is a slang term for a prostitute who does tricks just to pay the cable bill.

Milam was armed while he trafficked narcotics. In late August 2024, law enforcement intercepted communications indicating that Milam was making a trip to eastern Washington in a rental car for what appeared to be a drug run. As Milam made his way back, law enforcement conducted a traffic stop on Milam's vehicle. Law enforcement obtained a warrant to search the vehicle after a drug canine alerted to the presence of narcotics in the vehicle. Inside, law enforcement didn't find any narcotics, but they did find a loaded handgun as depicted below.



Following the seizure, law enforcement intercepted Milam telling an unknown male that he had been pulled over by police. He told the unidentified male, "I yanked the shit (drugs) out of it though" indicating that there were drugs in the vehicle even though law enforcement didn't find any when they searched the vehicle.

According to Milam's criminal history report, he was convicted in 2024 out of King County Superior Court cause number 23-1-05424-1) for (1) Promoting Prostitution in the Second Degree, and (2) Unlawful Possession of a Firearm in the Second Degree; and has convictions from 2022 out of King County Superior Court cause number 22-1-04256-3 for (1) Reckless Endangerment, and (2) Assault in the Fourth Degree.

1 **G. TYRELL LEWIS & MIRACLE PATU-JACKSON:**

2 Tyrell Lewis & Miracle Patu-Jackson served as couriers for Marquis on a 100,000
 3 pill fentanyl deal. They first met with Edgar Valdez on August 9, 2024 to pick up
 4 samples. Marquis got mad at Miracle because she provided Valdez the entire buy money
 5 (\$50,000) for just the shipment, which indicates that Miracle had not been engaged in
 6 drug trafficking for an extended period. Before the subsequent 100,000 pill deal, Mandel
 7 called Miracle to tell her to “take care of business.” Tyrell got on the phone and told
 8 Mandel, “I’m not about to let her handle this situation again.” He told Mandel, “I know
 9 the game... usually we want to keep the plug away from our family and our sisters.”
 10 These calls indicate that Miracle was new to drug trafficking, but Tyrell had been
 11 involved in drug trafficking for some time.

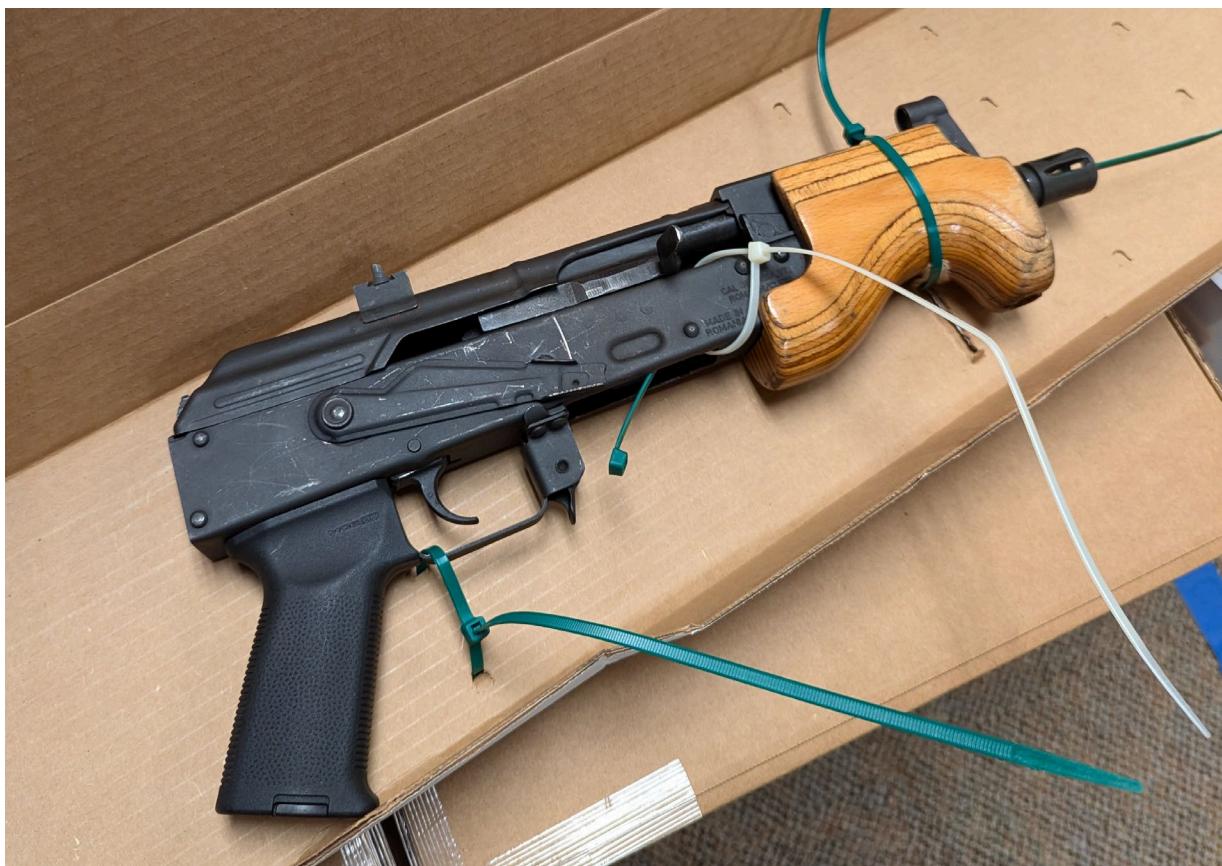
12 **H. ROBERT JOHNSON & ADEAN BATINGA:**

13 Robert Johnson and Adean Batinga served as a redistributor for the Jackson DTO.
 14 Both were present in the vehicle during the March 7, 2024 controlled purchase of 5,000
 15 pills. They used Batinga’s phone and vehicle, but Robert Johnson provided the drugs to
 16 the UC in exchange for the money. Agents intercepted Batinga’s phones which revealed
 17 frequent street level drug transactions.

18 Intercepts regarding Robert Johnson showed that his residence served as a central
 19 meeting place and likely stash house for DTO members. Agents intercepted multiple calls
 20 where Markell described needing to stop by “Rob’s house” to either pick up money or
 21 drugs. Additionally, law enforcement observed an apparent drug transaction right outside
 22 of Robert Johnson’s house. On June 10, 2024, law enforcement intercepted Markell tell
 23 Milam, “I’m in Renton, still bussin this juug.” Shortly after, law enforcement observed
 24 Markell parked in front of Robert Johnson’s house with Robert Johnson talking to the
 25 driver of a red Cadillac. Minutes later, agents intercepted a follow up call where Markell
 26 told Milam, “I’m already here, brother. I already served em.” Milam asked, “Where?”
 27 Markel replied, “In the red Cadi. Right in front of you.”

1 Additionally, as discussed previously, intercepts indicate that Robert Johnson was
2 armed with a firearm. In the August 29, 2024 call between Mandel and Markell, Mandel
3 asked if Markell or Rob had any guns, and Markell replied, “we only got chops” which
4 infers that both Markell and Rob were armed with rifle style weapons. As described
5 previously, Robert Johnson also discussed a potential trade of pistols between Markell
6 and another DTO associate.

7 On October 2, 2024, agents served a warrant on Robert Johnson’s residence where
8 they arrested both Robert Johnson and Adean Batinga. Inside Robert Johnson’s bedroom,
9 law enforcement found an AK-variant pistol that appears to be consistent with the prior
10 call between Mandel and Markell where Markell indicated that he and Robert Johnson
11 had “chops.”



1 **I. MATELITA JACKSON:**

2 Matelita Jackson is married to Mandel Jackson and the mother of Marquis Jackson
 3 and Miracle Patu-Jackson and the step-mother to Markell Jackson. Agents intercepted her
 4 in the background of communications between Mandel and Marquis Jackson both before
 5 and after the 100,000 fentanyl pill deal with Valdez. Matelita mainly assisted the Jackson
 6 DTO by helping launder their money both through structured deposits and using her
 7 account as a “pass-through” account between Marquis and Markell Jackson and other
 8 members of the DTO. Matelita has lengthy ties in the community and no prior criminal
 9 history.

10 **J. TIANNA KARASTAN:**

11 Tianna Karastan served as a courier for the Jackson DTO. On January 12, 2023,
 12 Delta airlines contacted Phoenix PD regarding a suspicious bag. Inside the bag, law
 13 enforcement found three whey protein containers (consistent with both the Michael
 14 Young package and the 6,500 pills seized from Robert Bellair) containing 4.85 kilograms
 15 of fentanyl pills. Airport surveillance footage shows Tianna Karastan checking in the
 16 suitcase and then leaving the airport. Agents then obtained flight records showing that
 17 Karastan made at least 18 flights between Phoenix and Seattle from April 2022 to
 18 January 2023. Agents also uncovered financial payments from Matelita Jackson to
 19 Tianna Karastan in the days immediately before and after her January 12th flight.



V. CONCLUSION

For the reasons set forth above, the government respectfully submits that Marquis Jackson, Markel Jackson, Mandel Jackson, Edgar Valdez, Keondre Jackson, Sir Terrique Milam, Tyrell Lewis, and Robert Johnson are unable to overcome the presumption against detention that applies to this matter and should therefore be detained pending trial.

DATED this October 2, 2024.

Respectfully submitted,

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